



UNIVERSITY
of HAWAII®
SYSTEM

Garret T. Yoshimi
Vice President for Information Technology
and Chief Information Officer

November 8, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

RE: MB Docket No. 05-311

Dear Ms. Dortch:

The University of Hawai'i respectfully submits comments on the proposed rules that would severely limit and likely damage the provisioning and connections provided under the Institutional Network ("INET") provisions of the current cable television franchise agreements, as administered by the State of Hawai'i, Department of Commerce and Consumer Affairs. Hawai'i State government and public education entities have a long history of highly beneficial reliance on the contractual provisions established and enforced by the State of Hawai'i, under the authority of the Cable Act. The INET provides substantial interconnection capabilities to and between virtually all locations of Hawai'i State government and public education operations, throughout the State of Hawai'i. In accord with the INET provisions, access to capacity on the franchisee's infrastructure is provided solely for the use and benefit of government and public education institutions. This is especially important in light of Hawai'i's geography, with operations spread over all major islands, and the simply unaffordable option of purchasing such services from the limited number of competitors in the state.

The long term viability of the INET has also created opportunities to invest limited Federal grant funds to help maximize the reach of the INET to many remote public education locations, serving the most rural of Hawai'i's population. It is important to note that while the additional, albeit limited investments made to extend the INET coverage, also benefitted the franchisees by allowing them to leverage those funds to similarly expand the reach of their own infrastructure. Over the duration of multiple franchisee agreement terms, the collective of government and public educational institutions have established an efficient working partnership with the franchisees, to ensure fair and equitable deployment of the INET, while working to ensure efficient use and access to the franchisees' infrastructure. All entities fully recognize and acknowledge the costs to franchisees, and the high value benefits received from the INET, and believe that we can, under the guidance of DCCA, continue to maximize the benefits for years to come.

2520 Correa Road, ITC, 6th Floor
Honolulu, Hawai'i 96822
Telephone: (808) 956-3501
Fax: (808) 956-7322

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The proposed change in Federal rules would have a severe, adverse impact on the level of access and connectivity provided by the INET, over both current, and future years. Impacts to the INET would likely result in limiting services available to Hawai'i State government and public education, with the option of purchasing equivalent or even sub-par replacement services being simply unaffordable. Long term impacts would likely include degraded service in traditional high cost service areas, including all neighbor island geographies, that would only be offset by diversion of limited funds from other operational needs. Such long term impacts would be amplified across the range or low-income neighborhoods.

Please feel free to contact me at 808-956-3501 or gyoshimi@hawaii.edu if you have any questions on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Garret T. Yoshimi', with a long, sweeping horizontal line extending to the right.

Garret T. Yoshimi
Vice President for IT and CIO